

## STAPPA/ALAPCO PALs draft

STAPPA/ALAPCO has prepared draft model rules for three types of PALs. They are a declining actual emissions based PAL, a non-declining actual emissions based PAL, and an allowables based PAL. Their differences are outlined below:

	EPA	Option A	Option B	Option C
Level	Baseline Actual + Significant Thres  Units post baseline get PTE	Baseline Actual + Significant Thres  At 5 Years, equal to BACT for each significant unit plus actual from small units plus significant thres	Baseline Actual + Significant Thres	Baseline Actual _ Significant Thres  At 5 years, install BACT on all significant units. After BACT controls, PAL equal to PTE plus actual from small units plus the significant thres
Term	10 Years	10 Years	10 Years	10 Years
Past Avoid Lmts	Void	Maintained  Void if BACT applied	Maintained  Void if BACT applied	Maintained  Void if BACT applied
Expiration	PAL level distributed to units	BACT on significant units and remaining PAL allowable distributed amongst small units	PAL distributed amongst emissions units	BACT on significant units and remaining PAL allowable distributed amongst small units
New Units requiring PAL increase	Major NSR for all emissions units being changed	Major NSR with BACT on all significant units at facility under PAL	Major NSR for all emissions units being changed	Major NSR with BACT on all significant units at facility under PAL
Renewal	If new baseline >80% of PAL, PAL is maintained.  If new baseline is <80% of PAL, PAL is set at baseline plus significant thres	PAL level after 5 year BACT adjustment	Permitting authority sets at level it feels is representative of baseline	All significant units must have BACT